

LEONARDO M. ALDRIDGE

Attorney-At-Law
20 Vesey St. Suite 400
New York, NY 10007

February 1, 2024

BY ELECTRONIC FILING

Hon. George B. Daniels
United States District Judge
United States Courthouse
500 Pearl St. New York, NY 10007

SO ORDERED

The pretrial conference is adjourned to
February 21, 2024, at 11:00 a.m.



GEORGE B. DANIELS
UNITED STATES DISTRICT JUDGE

FEB 02 2024

Re: U.S. v. Andres Caicedo, Cr. No. 21-021

Your Honor:

I write to respectfully request, with no objection from the government, a second adjournment to the pre-trial conference currently scheduled for February 6. If the Court grants this second adjournment, Mr. Andres Caicedo, through undersigned counsel, would move the Court to exclude the time between February 6 and whenever the conference is re-scheduled, pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The defense respectfully submits that the ends of justice served by the granting of the proposed exclusion outweigh the best interests of both the public and my client in a speedy trial, as the proposed exclusion will allow my client time to review discovery, and the parties time to discuss the possibility of pretrial resolution of this case.

I was appointed to this case on December 7, 2023, under the provisions of the Criminal Justice Act. A pre-trial conference had been scheduled for January 23, 2024. In a letter to this Honorable Court dated January 12, I requested a first adjournment because of a calendar conflict. The Court, in an order from January 17, graciously endorsed this non-disputed adjournment and re-scheduled the conference for February 6. Now, I must once again seek the indulgence of the Court and the government in requesting a second adjournment because I had long ago scheduled a vacation with my wife and daughter from February 5-9, which conflicts with the February 6 conference.

I have conferred with the prosecutors representing the government and they do not object to this second adjournment provided I seek that the time be excluded from any Speedy Trial Act calculations, which I have done in the first paragraph of this letter motion. I respectfully suggest that, if the Court's calendar can accommodate it, the conference be re-scheduled for February 21 or any date thereafter.

Respectfully,

S/Leonardo M. Aldridge
Leonardo M. Aldridge

Cc. AUSAs Jonathan Bodansky and Adam Marguilles